

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:
Janice Carrington,

Debtor.

Chapter 11
Case No. 20-10034 (LGB)

DEBTOR'S MOTION FOR STAY PENDING APPEAL

JANICE CARRINGTON, Debtor and Debtor-in-Possession (the “**Debtor**”) in the above-captioned Chapter 11 case, moves in accordance with Rule 8007 of the Federal Rules of Bankruptcy Procedure for an Order staying the Court’s August 2nd, 2023, Order for Turnover of Proceeds pending Appeal to U.S. District Court Civil Docket#: 1:23-cv-06430.

ARGUMENT

All relevant legal factors weigh in favor of staying the Court’s Order pending Appeal. The Fourth Amendment guarantees against unlawful seizure of property. Until U.S. District Court finally determines the proven rights and claims of the parties in this case, including the rights of the debtor throughout this case and in every step of this case by each “interested party,” the Debtor’s Motion for Stay Pending Appeal must be ordered by this Honorable Court.

THEREFORE, Debtor, in the interest of the highest Supreme notion of Jurisprudence, files this Motion for Stay Pending Appeal to the transfer of funds until this Case is properly adjudicated without irreparable harm to debtor and in the best interests of valid creditors.

Dated: August 7, 2023

Respectfully submitted,

JANICE CARRINGTON

By /s/ Janice Carrington